



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 23, 2007

John Botts, Treasurer
NARAL Pro-Choice America PAC
1156 15th Street NW, Suite 700
Washington, DC 20005

Response Due Date:
April 23, 2007

Identification Number: C00079541

Reference: 30 Day Post-General Report (10/19/06-11/27/06)

Dear Mr. Botts:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Your report discloses an outstanding balance(s) beginning this period for a debt(s) owed to "LSG Strategies." However, an outstanding balance(s) at the close of the period was not disclosed on your 2006 12 Day Pre-General Report. Please amend your report(s) to clarify this discrepancy.

-Schedule E supporting Line 24 of your report discloses an independent expenditure paid this period totaling \$1,600.60 owed to "LSG Strategies." In memo text, you state "See Pre-General Report." However, a MEMO Schedule E is not disclosed on the 2006 Pre-General Report. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy or provide clarifying information regarding the nature of this debt.

-Your committee filed a 24 hour notice(s) informing the Commission of independent expenditures made in support or opposition of federal

candidates with "LSG Strategies" as the payee(s). However, the amounts and dates of public dissemination disclosed on the notice(s) do not appear to correlate with the entries disclosed on Schedule E, supporting Line 24 for the reporting period. If your committee has filed a 24 hour notice(s) for independent expenditures that are not reflected on your report(s), you must file Schedule E during the appropriate reporting period(s) to disclose the payments. Please amend your report to clarify this discrepancy and provide clarifying information.

-2 U.S.C. §434(b)(6)(B)(iii) requires that the supporting schedule for disclosing independent expenditures be signed by the treasurer. This is to attest to the fact that the expenditures were not made in cooperation, consultation, or concert, with, or at the request or suggestion of, any candidate or any authorized committee or agent of such committee. Please amend your Schedule E accordingly.

-Schedule B discloses an expenditure(s) for "Printing" and "Automated Calls." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) and voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

-You have previously indicated that your committee has been using "best efforts" to obtain the full name, mailing address, occupation and name of employer for each contributor. However, an increasing number of entries lack this information. Please amend your report by supplying the omitted information or providing an explanation of your efforts in this regard. 11 CFR §§104.3(a)(4)(i) and 104.7

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the

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committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Rosa G. Lewis

Senior Campaign Finance Analyst
Reports Analysis Division

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